

FAQ's for Local Planning Authorities on how biodiversity metric calculations may need amendments at the time a Local Nature Recovery Strategy (LNRS) is published.

Context

The statutory biodiversity metric tool includes a strategic significance (SS) multiplier to incentivise targeted habitat creation and enhancement in areas identified as “mapped measures”, within a local nature recovery strategy (LNRS).

There are implications as to how the SS multiplier is applied within the metric to baseline and post intervention on and off-site biodiversity habitats before and after the publication of a LNRS and for live applications within the planning portal at the time a LNRS is formally published.

Prior to the publication of an LNRS, LPAs should be clearly referencing which strategies and plans are to be used to inform the value applied to the strategic significance multiplier for baseline and post development habitats.

Further information on LNRS is detailed in the [LNRS guidance](#).

Pre-development biodiversity value

Schedule 7A (part 1, paragraph 5) of the Town and Country Planning Act (1990) (TCPA) defines a site's pre-development biodiversity value as the biodiversity value of the onsite habitat on the 'relevant date' – this in the case of planning permission, which is granted on application, will usually be the date of application. Although, habitat surveys from earlier than the date of application can be utilised, if the biodiversity value has not changed.

As such, if an LNRS is published after the 'relevant date', the pre-development biodiversity value of a site can not to be re-assessed, given that the value is date stamped on the 'relevant date'.

For example, a planning application is submitted on the 21st of September 2024, and there is no published LNRS for the strategy area on the date the application is submitted. The pre-development biodiversity unit metric value has been calculated using the statutory metric details on page 27 and 29 and within Table 8 of the user guide (Figure 1)¹ are followed to assign the appropriate strategic significance multiplier.

If the LNRS for the strategy area is published after the date the application is submitted, the baseline biodiversity unit value remains unchanged as it relates to the 'relevant date' when it was calculated i.e. the 21st of September or the date of the habitat survey.

Post-development biodiversity value

Schedule 7A (part 1, paragraph 8), of the TCPA defines the post-development biodiversity value of a site's onsite habitat as the projected value of the onsite habitat as at the time the development is completed. If the publication of an LNRS while a planning application is live alters the SS multiplier value in the initial post-development metric calculation, the SS multiplier to be updated in the metric calculations to reflect the site's overall new post-development biodiversity value.

¹ The Statutory Biodiversity Metric User Guide, DEFRA, July 2024

Where an LNRS is published after grant of planning permission and before the submission of the Biodiversity Gain Plan to discharge the pre-commencement condition. The calculations for the site's post-development biodiversity value are to be reassessed using the correct SS multiplier for the on and off-site biodiversity units reflected by measures identified in the areas LNRS.

For example, consider a development which submitted a planning application on the 21st of September 2024, in a strategy area with no published LNRS on the submission date, and planning permission is granted on 11th December 2024. The applicant is about to submit their Biodiversity Gain Plan to discharge the pre-commencement statutory biodiversity gain condition on 27th February 2025 and the LNRS for the strategy area was published on 2nd February 2025. The submitted Biodiversity Gain Plan, if prepared before the LNRS was published will need to update the post-development biodiversity metric unit value to reflect any change in the SS significance multiplier of both proposed post-development on and off-site habitats. This is to capture whether the proposed habitat interventions are consistent with mapped measured identified within the published LNRS. An updated metric calculation tool is also to be submitted.

Where details of the post-development biodiversity unit values have been secured at the application stage through legal agreement, we anticipate these agreements are likely to contain clauses that set out what happens in such cases.

How will the application of the SS multiplier in the statutory biodiversity metric tool change when an LNRS is published?

Pre-publication

The details on page 27 and 29 and within Table 8 of the user guide (Figure 1)² should be followed to correctly assign the strategic significance multiplier for on and off-site baseline and post development habitats. The SS multiplier options available are low, medium or high.

When published

For new non-exempt planning applications submitted after the publication date of the LNRS the SS multiplier for **all** on and off-site baseline habitats is to be marked "Low". The SS multiplier for post development habitats that meet the 'High' criteria listed in Table 7, page 28 of the user guide (Figure 1)³, are to be marked 'High', and where habitats do not meet the 'High' criteria the SS multiplier is to be marked 'Low'. The medium SS multiplier category is redundant and not to be used, where a strategy area has a published LNRS.

What does this mean for validated and undetermined planning applications at the time an LNRS is published?

On and off-site baseline biodiversity values

Schedule 7A, Part 1, Paragraph 5 of Town and Country Planning Act (1990) states that in most cases the pre-development biodiversity value of a site is that at date of submission of the application.

The publication of a LNRS whilst an application is live will not require any changes in the SS multiplier applied to baseline habitat values.

² The Statutory Biodiversity Metric User Guide, DEFRA, July 2024

³ The Statutory Biodiversity Metric User Guide, DEFRA, July 2024

On and off-site post-development biodiversity values

If through the publication of an LNRS the value of the post-development biodiversity units derived through the metric calculations are likely to be altered by the SS multiplier, the post-development biodiversity values are to be reassessed, in light of the published LNRS. Where updates are required, the revised documents, including metric calculation tool, HMMP, Gain Plan, and landscape details are to be submitted to the LPA for consideration, making clear reference to the scale and significance of any change(s).

Any change in biodiversity unit values needs to be reflected in the sites overall post-development biodiversity value in accordance with Schedule 7A, Part 1, Paragraph 8 of Town and Country Planning Act (1990) where the post-development biodiversity value of on-site habitat is the projected value as at the time the development is completed. A revised and updated metric will need to be submitted to the LPA and design modifications might be required to meet biodiversity net gain requirements.

What does this mean for planning applications that have been approved prior to publication of an LNRS, and the LNRS is published before submission of the gain plan (to discharge the pre-commencement biodiversity net gain condition)?

On and off-site baseline biodiversity values

There is no need to reassess the baseline values as these are taken at the time the application is submitted.

Post development on-site biodiversity values

The SS multiplier applied to the post development habitats will need to be reassessed according to the criteria in Table 7 of the user guide (Figure 1) , and reflected by mapped measures identified in the strategy areas LNRS.

For future applications where the reassessment of the SS multiplier could result in a difference in biodiversity units from the original unit count, the legal agreements secured at the time permission is granted should contain clauses which set out what is to happen in such cases.

Post development off-site biodiversity values

The SS multiplier applied to the post development habitats will need to be reassessed according to the criteria in Table 7 of the user guide (Figure 1), and reflected by mapped measures identified in the strategy areas LNRS.

LPA Considerations

Build in flexibility within the legal agreements that secure the post development biodiversity unit values delivered on and off-site as calculated by the metric (before an LNRS is published) as the SS multiplier has the potential to change the biodiversity unit value, and clauses should be put in place to account for arising variations.

Ahead of publication of a draft LNRS publicly communicate which strategy or plan is to be used to determine the strategic significance multiplier for baseline and post development habitats.

Publicly communicate proposed LNRS consultation draft and publication dates. Clearly communicate the implications for applicants so that they are prepared for any reassessments of the SS multiplier that might be required when the application is live, or to discharge pre-commencement biodiversity gain condition.

Decide whether or how to use the information in a LNRS consultation draft to inform SS multipliers in the transition period to formal publication.

On publication of LNRS, contact applicants of all non-exempt live planning applications, to make them aware of the need to reassess the SS multiplier for post-development biodiversity metric values.

Strategic significance

Strategic significance is the local significance of the habitat based on its location and habitat type.

You should assess each individual habitat parcel, both at baseline and at post-intervention, for on-site and off-site. You should split habitat parcels where they are intersected by:

- a boundary between two areas of different strategic significance
- a planning authority boundary

You should assign strategic significance for off-site habitats using relevant local documents for the off-site location rather than the development location.

Where a Local Nature Recovery Strategy (LNRS) has been published

You should use the relevant published LNRS, and the descriptions set out in table 7 to assign strategic significance.

[Find out more about Local Nature Recovery Strategies](#)

Where an LNRS has not yet been published

You should use the specified alternative documents, and the descriptions set out in table 8 to assign strategic significance. When there are no alternative suitable documents for assigning high strategic significance, medium strategic significance can be assigned when the criteria in table 8 are met.

A relevant planning authority should specify alternative documents for assigning strategic significance whilst an LNRS is put in place. Examples include:

- Draft Local Nature Recovery Strategies
- Local Plans and Neighbourhood Plans
- Local Planning Authority [Local Ecological Networks](#)
- Tree Strategies and Woodland Strategies
- Area of Outstanding Natural Beauty Management Plans
- Biodiversity Action Plans
- Species conservation and protected sites strategies
- Green Infrastructure Strategies
- River Basin Management Plans
- Catchment Plans and Catchment Planning Systems
- [Shoreline management plans](#)
- Estuary Strategies

Table 7 Biodiversity metric strategic significance categories and score applied in the metric where an LNRS has been published

Category	Score	Description
High (Formally identified in local strategy)	1.15	<p>This category can be applied when:</p> <ul style="list-style-type: none"> the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and the intervention is consistent with the potential measure proposed for that location <p>If your project delivers the mapped potential measure set out in the LNRS you should:</p> <ul style="list-style-type: none"> record strategic significance as low in the baseline record strategic significance as high in post-intervention sheets record that you have applied the published LNRS in your gain plan
Medium	1.10	This category cannot be applied.
Low (Area / compensation not in local strategy)	1	<p>Where the definitions for high strategic significance are not met.</p> <p>Even if your project is an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.</p>

Table 8 Biodiversity metric strategic significance categories and score applied in the metric where an LNRS has not yet been published

Category	Score	Description
High (Formally identified in local strategy)	1.15	<p>The habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority.</p> <p>If your project delivers the mapped habitat creation, enhancement or actions set out within specified alternative documents, or enhances an existing habitat identified within specified alternative documents as locally ecologically important, strategic significance can be recorded as high in the post-intervention sheets.</p> <p>If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline.</p> <p>You should record the name of the plan the relevant planning authority has specified in the user comments and record that you have used the specified document in your gain plan.</p>
Medium (Location ecologically desirable but not in local strategy)	1.10	<p>This category can be applied when the LPA has not identified a suitable document for assessing strategic significance. Users should:</p> <ul style="list-style-type: none"> • explain how the habitat type is ecologically important within a specific location • demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations • use professional judgement <p>When the above criteria are met, strategic significance may be recorded as medium in the baseline and post-intervention sheets.</p>
Low (Area / compensation not in local strategy)	1	<p>Where the definitions for high or medium strategic significance are not met.</p>